

Attorney's Docket No.: 07326-002003

Amendments to the Drawings:

The attached replacement sheets of drawings include changes to Fig. 2 and 3 and replaces the original sheets including Fig. 1-3.

Figure 2 has been amended to add the video generation unit, and a notation that the video represents "n bits".

Figure 3 has been amended to properly recite the unit 70.

Attachments following last page of this Amendment:

Annotated Sheets Showing Changes (2 pages)

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REMARKS

Reconsideration and allowance of the above referenced application are respectfully requested.

Claims 1-10 and 13-21 stand rejected under 35 USC §112, first paragraph, as allegedly failing to comply with the written description requirement. This contention is respectfully traversed. Initially, and with all due respect to the patent office, it should be noted that a specification supports not only what is specifically stated in the specification, but also anything that is implicit, intrinsic, or inherent from the actual disclosure in the specification. See, for example, Brooktrout Corp. v. Advanced Micro Devices, 977 F.2d 1555 (Fed Cir 1992). If something is implicit or intrinsic within the specification, then it is legally disclosed in that specification. With all due respect, the rejection under §112 is asking for absolute literal support for the language of the claims. In fact, Claims 10-11 and 13-21 were clearly described in the specification in a way that conveyed that the inventor had possession of that subject matter.

Claim 10 defines that the video generation element produces information indicative of an image to be displayed but sends only new picture information representing changes in the

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displayed information when there is a change in contents of the image. Page 13 of the original specification describes that the arrangement is such that "new picture information must be transmitted only when there is a change in some part of the displayed image". Lines 21-22 of page 13 explain that information to update the display can be transmitted in bursts. Therefore, the video generation element need send new picture information representing changes when there is a change in contents of the image.

The rejection apparently bases the rejection on the fact that the exact words "contents" of the displayed image are not found in the original specification. While Applicants disagree strongly with this, in order to obviate this issue, the exact words from the specification "some part:" have been added to Claim 10.

For Claim 13, the specification clearly discloses that the video information includes only new information representing changes in an image. See above.

The rejection apparently states that there is no teaching or suggestion of the video output including at least one synchronization signal in Claim 1 (which is assumed to refer to Claim 2). This is respectfully traversed. Page 9 lines 17-22 explain that video as well as horizontal and vertical

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synchronizing signals are generated. See page 9 lines 21. Page 9 lines 20-22 explains that "these signals are transmitted also" according to the present invention. Clearly, Claim 2 is supported.

Claim 10 is rejected stating that there is no support for the video generation element which "produces information indicative of an image to be displayed on the display part". Clearly this is supported at page 10 lines 16-24, as well as in other parts of the specification which describe the display signal (page 12 lines 1-4), a high-resolution display device described at page 12 line 20, through page 13 line 5, as well as parallel bit signals containing picture information. Clearly the video generation element produces video information.

The signal with parallel bits containing picture information is disclosed at page 13 lines 6-7.

A video processing part that produces information indicative of video is clearly disclosed as the "cards" described at page 12 line 19, through page 13 line 22. The statement that the specification only discloses a CPU with microprocessor is incorrect. Clearly page 12 line 22 describes a graphics card, and other such analogous structure is also disclosed.

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Claims 9 and 14 stand rejected under 35 USC §112, second paragraph, as allegedly being indefinite. Claim 14 was previously amended to remove the term "second processing unit". The term "second processing unit" is not found in Claim 9.

The drawings stand objected to under Rule 1.83(a). The video generation unit, and a notation that the video represents "n bits", has been added to Figure 2. Figure 3 has been amended to properly show the "unit 70".

Claims 2-5 and 8 and 12 stand rejected under 35 USC §102 as allegedly being anticipated by Lemelson. Claims 4, 6, 11 and 18-20 stand rejected as being obvious over Lemelson in view of Tymes. Claims 10, 13-14, 17 and 21 stand rejected as being obvious over Lemelson in view of Taaffe. Claim 9 is rejected over Lemelson in view of Pfeiffer. Each of these contentions are respectfully traversed, and with all due respect, it is respectfully suggested that the rejections do not meet the patent office's burden of providing a prima facie showing of unpatentability.

Initially, consider the scope and contents of Lemelson. Lemelson teaches a video phone, which creates both video and audio to be sent from one unit, the transmitter, to the other unit, the receiver. However, what is actually sent from the transmitter to the receiver, is effectively still pictures

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representative of the scene. Column 11 describes how a full frame of video information is generated at any one time. See lines 24-25. Once the picture is in the memory, it is sent. The video picture information is sent to the receiver. See column 11 lines 63. Therefore, the audio is displayed along with a picture indicative of the information. That picture may be changed from time to time, but it is a picture which is sent.

This is important, since the information that is really sent is a picture, and not video. Therefore, since pictures are sent, there is no teaching or suggestion of a synchronization signal for the video generation element. Claim 2 requires that the video generation element produces a video output including at least one synchronization signal, and sends the video output to the first housing to drive the display information based on the video output and the at least one synchronization signal. Lemelson never teaches sending a video output with a synchronization signal. Lemelson uses stop motion video, one complete frame at any one time. There is no need for any synchronization signal and one is certainly not sent thereby. Therefore, Claim 2 is different than Lemelson, since Lemelson never teaches anything about a synchronization signal. Claim 2 should hence be allowable along with the claims that depend therefrom.

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Claim 3 is even further allowable since it requires horizontal and vertical sync, which is never taught or suggested by Lemelson to be sent to the remote unit. Lemelson certainly uses a video sync in order to produce the single frame of video information which he sends. However, it never sends it to the display part to display information based thereon.

Claim 8 defines an RGB signal, which is nowhere taught or suggested by Lemelson. In fact, Lemelson uses full image frames, which excludes the possibility of an RGB signal. The cited section: column 3 lines 10 through 18, refers to formation of the image, not what is sent from one device to the other.

Each of the dependent claims should be allowable on their own merits, however the secondary references will also be described. Tymes admittedly teaches sending different kinds of information over different channels in a barcode type data communication system. It teaches nothing about sending horizontal and vertical sync signals on different frequency channels. In fact, as discussed above, there is no teaching or suggestion of horizontal and vertical signals at all.

This rejection itself is based on hindsight, since there is no suggestion for this combination. Similarly, the recitation of bursts in Tymes is wholly inapplicable to the present system. Tymes refers to packeted data, not to video. There is no

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teaching or suggestion of using bursts to transmit video in any fair combination between Lemelson and Tymes.

In rejecting Claim 10, the rejection calls on the secondary reference Taaffe. The claimed subject matter is not suggested by Lemelson in view of Taaffe. Taaffe teaches that additional images may be displayed based on information in the cache. For example, when there are multiple images displayed on multiple portions of the monitor, then portions of that image are preserved in the image display. This refers to storage of images, not, as claimed, the display of video. According to Taaffe, once an image is displayed, it can be maintained in the monitor. However there is no teaching or suggestion of doing this with a video.

Moreover, there is no teaching or suggestion of sending only the new picture information representing changes in the image, as claimed. Taaffe merely describes that part of the information is stored in the buffer, it teaches nothing about sending only the new picture information as claimed.

Claim 13 should be allowable for analogous reasons. Claim 13 requires a wireless transceiver that receives video information including only new image information representing changes in an image since the previous transmission. Taaffe

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teaches sending new images, it teaches nothing about sending changes in an image.

Claim 14 is even further allowable since it defines a part that processes the video information to obtain these changes which is not taught or suggested by the cited prior art. Claim 17 defines the vertical sync and horizontal sync on separate frequency channels which is nowhere taught or suggested by Taaffe. Each of these claims should hence be allowable for these reasons.

The additionally cited reference to Pfeiffer may teach aspects of parallel-to-serial conversion. However, there is no teaching or suggestion of parallel bits being produced by Taaffe, for converting that to serial to be transmitted.

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any

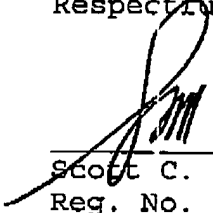
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claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Applicants ask that all claims be allowed. No fee is believed to be due, however please apply all applicable charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

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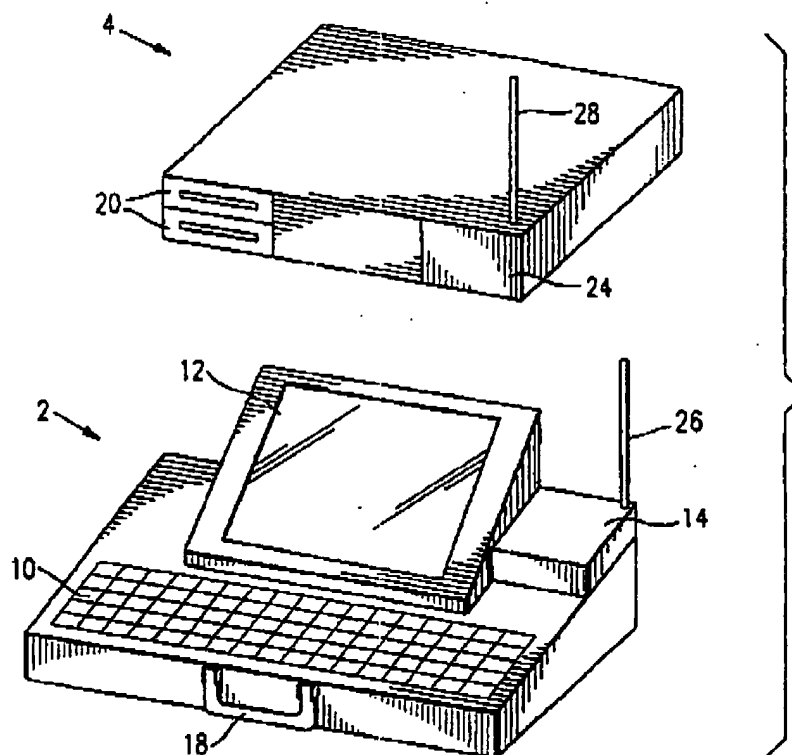


FIG. 1

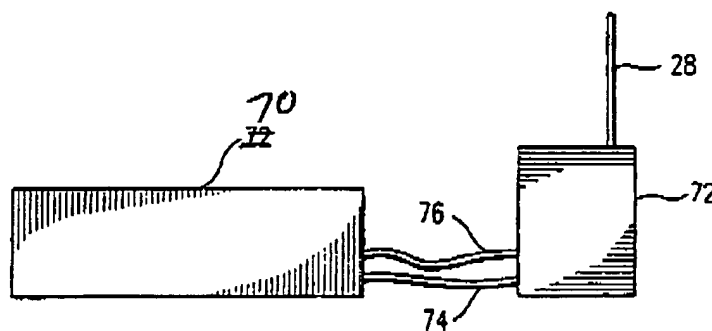
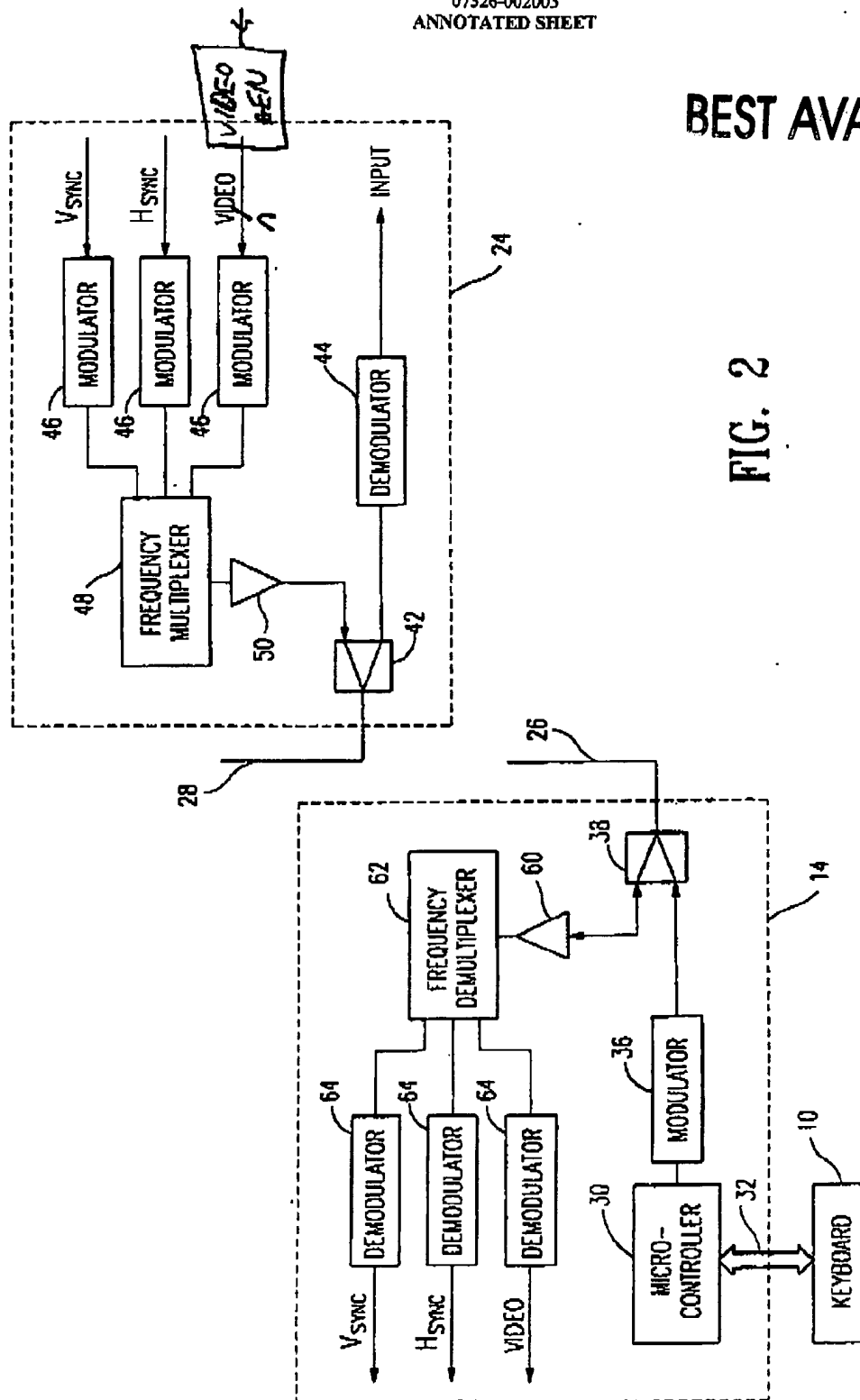


FIG. 3

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FIG. 2